I.D. 6280752 File No. 3900-504

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS Eastern Division

J&J SPORTS PRO	DUCTIONS, INC.,)	
	Plaintiff,)	
v.)	Case No. 2013-cv-8497
)	
AGUSTIN ROZON	N, indv. and d/b/a PREMIUM	1)	
PIZZA RESTAUR	ANT, INC. d/b/a PREMIUM	()	
PIZZA and PREM	IUM PIZZA RESTAURANT	Γ,)	
INC. d/b/a PREMI	UM PIZZA,)	
	Defendants.)	

PLAINTIFF'S MOTION FOR JUDGMENT

NOW COME the Plaintiff, J&J SPORTS PRODUCTIONS, INC., and respectfully requests that this Court Reinstate this matter against Defendants, AGUSTIN ROZON, indv. and d/b/a PREMIUM PIZZA RESTAURAN, INC. d/b/a PREMIUM PIZZA and PREMIUM PIZZA RESTAURANT, INC. d/b/a PREMIUM PIZZA, enter judgment against Defendants, and in support thereof, states as follows:

- 1. Parties entered into a Release and payment plan (attached hereto as Exhibit A).
- 2. That on March 3, 2015, this mattered was dismissed without prejudice pursuant to the parties Stipulation to Dismiss.
 - 3. That on November 5, 2015, the Court granted Plaintiff's motion to reopen the case.
- 4. That as of the filing of this motion, Defendants have failed to make any payments pursuant to the Release and are in default of the settlement agreement.
- 5. Defendant, AGUSTIN ROZON, filed a Chapter 7 bankruptcy petition on December 2, 2015, and an Order of Discharge was issued by the bankruptcy court on March 4, 2016.
 - 6. Pursuant to the Release, Defendant, PREMIUM PIZZA RESTAURANT, INC.

d/b/a PREMIUM PIZZA, agreed to a consent judgment in the amount of Eight Thousand and 00/100 (\$8,000.00) Dollars, and pay all reasonable attorney's fees and court costs if Defendants default on the agreement. (See Exhibit A, p.2; Attorney Fee Affidavit attached hereto as Exhibit B).

7. That Plaintiff is further entitled to One Thousand Eight Hundred and 00/100 (\$1,800.00) Dollars for attorney's fees and costs. See Exhibit B.

WHEREFORE, Plaintiff, J&J SPORTS PRODUCTIONS, INC., prays this Honorable Court enter an Order for Judgment against Defendant, PREMIUM PIZZA RESTAURANT, INC. d/b/a PREMIUM PIZZA, in the amount of Eight Thousand and 00/100 (\$8,000.00) Dollars plus attorney's fees in the amount of One Thousand Eight Hundred and 00/100 (\$1,800.00), for a total Judgment in the amount of Nine Thousand Eight Hundred and 00/100 (\$9,800.00) and for any additional relief for Plaintiff this Honorable Court deems just.

s/Andre Ordeanu
Andre Ordeanu

ZANE D. SMITH & ASSOCIATES, LTD. 415 North LaSalle Street - Suite 501 Chicago, Illinois 60654 (312) 245-0031 (312) 245-0022 - Fax

CERTIFICATE OF SERVICE

I, Andre Ordeanu, on oath state that a true and correct copy of the above document electronically filed with the Clerk of the Court on May 26, 2016, using the CM/ECF system which will send notification of such filing(s) to all attorneys of record, as well as mailed a copy to the Defendants *via regular mail*. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

s/ Andre Ordeanu Andre Ordeanu